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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X Docket No.07 CIV-6308
AARON RICHARD GOLUB,
(JGK) (ECF)

Plaintiff,

NOTICE OF CROSS-MOTION

-against-

TRANS UNION LLC and NATIONWIDE RECOVERY
SYSTEMS, LTD.,

Defendants.

-----X

PLEASE TAKE NOTICE, that upon the annexed declaration of Aaron Richard Golub, dated September 21, 2007 and the exhibits 1-13 annexed thereto, the Memorandum of Law dated September 21, 2007, and upon all the papers and proceedings heretofore had herein, plaintiff Aaron Richard Golub will cross-move this Court, before the Hon. John G. Koeltl, United State District Judge, at Courthouse, 500 Pearl Street, Courtroom 12B, at a date and time to be determined by the Court, for an order:

- (i) pursuant to Fed.R.Civ.P. 15(a) for leave to file the First Amended Complaint (Ex. 13);
- (ii) pursuant to 15 U.S.C § 1681n(c) and/or 15 U.S.C § 1681o(b) awarding plaintiff attorneys fees in connection with his opposition to defendant Nationwide Recovery Systems, Ltd's motion to dismiss; and
- (iii) for such other and further relief as to this Court seems just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Civil Rule 6.1(b), any opposing affidavits and answering memoranda shall be served within ten business days after service of the moving papers, and any reply affidavits and memoranda shall be served within five business days after service of the answering papers.

Dated: New York, New York
September 21, 2007

Respectfully submitted,

S/ NEHEMIAH S. CLANC
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